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Groundwater and Environmental Consultants

January 10, 2002

VIA FEDERAL EXPRESS

Mr. Robert Sanchez
Remedial Project Manager
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029\

Subject: Spectron Superfund Site, Elkton, Maryland

Dear Mr. Sanchez:

Thank you for your letter dated January 3, 2002 granting an extension until January 14, 2002 for the PRP Group to complete its review of the EPA's and MDE's comments on the RI/FS/RA for Soil and Overburden Ground Water and to prepare responses to these comments. Responses to comments on the RI/FS/RA and a revised version of the RA will be delivered to EPA on or before January 14, 2002.

As I indicated to you in my letter of November 19, 2001, the PRP Group's lead hydrogeologist, Ed Sullivan resigned from ERM effective November 26, 2001. As you are aware, Mr. Sullivan handled most of the day-to-day activities relating to the RI/FS for Soil and Overburden Ground Water and developed the Bedrock RI Work Plan.

Since learning of Mr. Sullivan's resignation from ERM, the PRP Group has been reviewing the qualifications of other hydrogeologists within ERM's proposed transition team and in other organizations. After careful consideration, the PRP Group has decided to transfer this assignment to Mr. Michael Kozar of O'Brien and Gere. As you are aware, Mr. Kozar has been evaluating the performance of the stream liner system and performing other hydrogeological consultation for the PRP Group. In addition to his direct experience with the Spectron site, a review of Mr. Kozar's qualifications indicates that he has considerable experience with ground water investigations in fractured rock involving volatile organic compounds and DNAPL, including other Superfund sites in Region III. A copy of Mr. Kozar's qualifications can be provided upon request. In recognition of the time-critical nature of this work, Mr. Kozar has reviewed the Bedrock RI Workplan prepared by ERM and has indicated to the PRP Group that OBG is

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prepared to implement the Work Plan as approved by EPA with no modifications or changes.

As stated in my letter dated January 4, 2002, we have received two signed access agreements from property owners. We anticipate receiving all remaining agreements by February 1, 2002. We have scheduled drilling activities to commence during the week of February 11, 2002 pending property owner approval. I will forward to you a detailed schedule once we have received all signed access agreements.

As was discussed at length in the December 19, 2001 meeting, and expressed in your cover letter that accompanied the Soil and Overburden Groundwater RI/FS/RA comments, EPA believes that a significant contamination source exists within the soils beneath existing buildings, concrete slabs and foundations and beneath the existing asphalt pavement. The PRP Group believes that the EPA's interpretation of site conditions may be inconsistent with the historical records for the site. Inspections made during the early 1980's, by the Maryland Department of Mental Health and Hygiene, Office of Environmental Programs identified areas at the site where drums containing hazardous substances were stored directly on the ground surface without any dikes or other means of spill containment. Further, these inspections determined that during the approximately 20 years of site activity, spills had occurred under hose connections adjacent to the tank farm dike and that the transfer of waste from both the F and G area dikes to 55 gallon drums resulted in repeated spills.

In response to the conditions found during these inspections, the site owner was required to excavate impacted soil from processing areas, storage locations and the former waste disposal pit and lagoon. Following the completion of these activities, concrete secondary containment structures were installed in the processing and storage areas and the remainder of the site was capped in asphalt. The site remained active for an additional three to five years.

The PRP Group has reviewed MDE records and has recently questioned the site owner about these source removal activities (refer to attachment). While the PRPs' investigation into this matter is not complete, there appears to be sufficient evidence to support the PRPs' position that some level of source removal was performed under the observation of MDE and that the potential contaminant mass removal resulting from these activities should not be dismissed.

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In its comments on the RI, EPA emphasizes that soil conditions beneath the existing concrete slabs and the asphalt cap have not been investigated. A review of the RI Work Plan confirms that this level of investigation was not contemplated at the time the Work Plan was approved by EPA.

If EPA now believes it is necessary to evaluate potential source areas and the completeness of the previous soil remediation activities, the PRP Group is willing to conduct a Focused RI to characterize current soil conditions beneath existing buildings, concrete slabs and the asphalt cover. In addition, as a component of the Focused RI, the PRP Group proposes to collect an additional round of ground water samples from the existing onsite monitoring wells and to collect additional data requested by MDE to address the MDE's concern regarding the effective containment area of the stream liner system.

The PRP Group is committed to continued progress towards the remediation of the site. The PRP Group also acknowledges the EPA's desire to issue a ROD for this site as soon as reasonably possible. The PRP Group is willing to identify the building and structure demolition as a separate operable unit (OU-3) and to proceed with the development of an ROD for this activity on a parallel track with the Focused RI and the Bedrock RI.

The PRP Group is willing to meet with EPA and MDE to discuss this proposal in detail, to address any administrative concerns and to develop a schedule for implementation.

Please contact me at (610)524-9466 to schedule a mutually agreeable time to meet.

Sincerely,



W. David Fennimore, P.G.
Project Coordinator

cc: Technical Committee-w/enclosure

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